

IN THE CIRCUIT COURT OF MARYLAND FOR BALTIMORE CITY
Civil Division

MELISSA FIRST
7580 Ives Lane
Dundalk, Maryland 21222

Plaintiff

vs.

WINSTON SINGLETON, JR.
83 Doyle Avenue, Apt. 214
Providence, Rhode Island 02906

Defendant

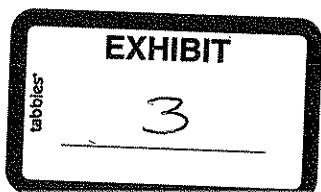
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* CASE NO.:

COMPLAINT

NOW COMES the Plaintiff, Melissa First, by her undersigned attorneys, Kevin A. Ruby, Esq., and Portner & Shure, P.A., and sues Winston Singleton, Jr., Defendant, and says:

1. Plaintiff Melissa First, (hereinafter "Plaintiff" or "First") is a resident of the State of Maryland, residing at the address indicated above.
2. Defendant Winston Singleton, Jr., (hereinafter "Defendant" or "Singleton") is a resident of the State of Maryland, residing at the address indicated above.
3. The accident upon which this Complaint is based occurred in Baltimore City where venue is claimed.
4. On or about May 14, 2015, the Plaintiff was carefully and lawfully operating her motor vehicle on I-95.
5. At or about the same time and place, the Defendant was operating his tractor trailer in the lane adjacent to the Plaintiff when he made an unsafe lane change, striking the Plaintiff's vehicle.



6. Defendant owed a duty to the Plaintiff to exercise due care by: keeping his vehicle at a speed reasonable and prudent under the circumstances then and there existing; maintaining a proper lookout for Plaintiff's vehicle and others on the road; yielding the right of way; maintaining a safe distance between his vehicle and Plaintiff's vehicle, and obeying the traffic laws, signs and devices relevant hereto, and; to otherwise operate his vehicle in a prudent and careful manner.

7. Defendant breached his duty to the Plaintiff by making an unsafe lane change, failing to keep his vehicle at a speed reasonable and prudent under the circumstances then and there existing, failing to maintain a proper lookout for Plaintiff's vehicle and others on the road, failing to yield the right of way, failing to maintain a safe distance between his vehicle and Plaintiff's vehicle, failing to avoid an accident when it became apparent or in the exercise of reasonable care, should have become apparent, that by continuing at the same course and speed, an accident would occur, failing to obey the traffic laws, signs and devices relevant hereto, causing a collision, and in otherwise failing to comply with his duty to Plaintiff to operate his vehicle in prudent and careful manner.

8. As a direct and proximate result of the collision between the vehicle driven by the Defendant and the vehicle driven by Plaintiff, the Plaintiff was caused to sustain severe and permanent injury; caused to incur medical bills and expenses; and was caused to endure pain and suffering. Furthermore, Plaintiff was precluded from enjoying his usual employment and other avocations.

9. The injuries, grievances and damages as hereinabove set forth, were caused by the carelessness, negligence, and recklessness of the Defendant as stated herein, without any carelessness or negligence on the part of the Plaintiff contributing thereto.

WHEREFORE, Plaintiff, Melissa First, brings this action and claims compensatory damages in an amount in excess of Seventy-Five Thousand Dollars (\$75,000.00) from Defendant Winston Singleton, Jr., plus interest, costs of this suit and such other and further relief as the Court may find appropriate.

PLAINTIFF'S REQUEST FOR JURY TRIAL

The Plaintiff, Melissa First, pursuant to Maryland Rule 2-325, prays a trial by jury on all issues.

Respectfully submitted,



Kevin A. Ruby, Esq.
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